

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

<b>GRADY O. HUMPHREYS, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>Civil Action Number:</b>
<b>v.</b>	)	
	)	<b>2:07-CV-607-WKW</b>
<b>A.O. SMITH ELECTRICAL PRODUCTS,</b>	)	
<b>COMPANY, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT P&H MINING'S CONFLICT DISCLOSURE STATEMENT**

COME NOW the Defendants, incorrectly designated as Harnischfeger Corporation and P&H Crane and more properly identified as P&H Mining Equipment, Inc., and in accordance with the order of this Court, making the following disclosure concerning parent companies, subsidiaries, partners, limited liability entity members and managers, trustees (but not trust beneficiaries), affiliates, or similar entities reportable under the provisions of the Middle District of Alabama's General Order No. 3047:

- ☐ This party is an individual, or
- ☐ This party is a governmental entity, or
- ☐ There are no entities to be reported, or
- ☒ The following entities and their relationship to the party are hereby reported:

**REPORTABLE ENTITY**

P&H Mining Equipment, Inc.

**RELATIONSHIP TO PARTY**

A wholly owned subsidiary of Joy Global, Inc., a publically traded company, is the appropriate legal entity of the Defendants designated as Harnischfeger Corporation and P&H Cranes

August 6, 2007

Date

s/William T. Mills, II

William T. Mills, II

ASB-0402-L72W; MIL014

Attorney for Kelly-Moore Paint

PORTERFIELD, HARPER, MILLS &  
MOTLOW, P.A.

Post Office Box 530790

Birmingham, Alabama 35253-0790

Telephone (205) 980-5000

Fax (205) 980-5001

E-mail: phm@phm-law.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

<b>GRADY O. HUMPHREYS, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>Civil Action Number:</b>
<b>v.</b>	)	
	)	<b>2:07-CV-607-WKW</b>
<b>A.O. SMITH ELECTRICAL PRODUCTS,</b>	)	
<b>COMPANY, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2007, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a copy of the document to all parties of record.

Respectfully submitted,

---

**s/William T. Mills, II**  
William T. Mills, II  
ASB-0402-L72W; MIL014  
Attorney for Kelly-Moore Paint  
PORTERFIELD, HARPER, MILLS &  
MOTLOW, P.A.  
Post Office Box 530790  
Birmingham, Alabama 35253-0790  
Telephone (205) 980-5000  
Fax (205) 980-5001  
E-mail: phm@phm-law.com